

ESTTA Tracking number: **ESTTA287545**

Filing date: **06/03/2009**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91187759
Party	Plaintiff Minnesota Twins, LLC
Correspondence Address	Mary L. Kevlin Cowan, Liebowitz & Latman, P.C. 1133 Avenue of the Americas New York, NY 10036 UNITED STATES rxl@cll.com, trademark@cll.com
Submission	Motion to Suspend for Settlement Discussions
Filer's Name	Roberto Ledesma
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Signature	/Roberto Ledesma/
Date	06/03/2009
Attachments	facetwinsMOTION2.pdf (3 pages)(9241 bytes)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

In re Application Serial Nos. 77/362,999, 77/363,003, 77/363,006, 77/363,008

Filed: January 2, 2008

For Marks: FACETWIN, FACE TWINS, FACETWINS, FACE TWIN

Published in the Official Gazette: May 20, 2008

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MINNESOTA TWINS, LLC,	:
	:
Opposer,	:
v.	:
	:
CHARLES MYERS,	:
	:
Applicant.	:
	:
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Consolidated Opposition No. 91187759

Commissioner for Trademarks
Attn.: TTAB
P.O. Box 1451
Alexandria, VA 22313-1451

**MOTION ON CONSENT TO CONTINUE SUSPENSION OF THE PROCEEDINGS
AND TO EXTEND DISCOVERY PERIOD IF OPPOSITION IS RESUMED**

Opposer, by and through counsel, hereby moves for an order to continue suspension of the proceedings in this matter for a period of six (6) months until **December 5, 2009**.

Applicant's counsel consented to this motion to suspend, which is requested to allow the parties time to continue settlement negotiations.

Progress has been made in this matter. A settlement agreement has been drafted and reviewed by both parties. The additional time is requested to allow the parties time to finalize terms to the agreement.

In the event that the Board denies this motion, Opposer consents to an extension of time for Applicant to file an answer or otherwise respond to the Notice of Opposition until sixty (60) days after such denial.

If the Board grants this motion, the Board should reset Applicant's time to answer or otherwise respond to the Notice of Opposition and the other deadlines. The parties request that six months of discovery be allowed and that the discovery cutoff be reset to six (6) months after the proceedings resume so that the parties will have the full period of discovery in the event that the matter is not able to be resolved. The trial periods and other periods should be reset accordingly.

Dated: New York, New York
June 3, 2009

Respectfully submitted,

COWAN, LIEBOWITZ & LATMAN, P.C.
Attorneys for Opposer

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I caused a copy of the foregoing MOTION ON CONSENT TO SUSPEND to be sent via first class, postage paid mail to Applicant's Attorney of Record, Michael Catania, Esq., Clause Eight Intellectual Property Services, PO Box 131270, Carlsbad, CA 92013-1270, on June 3, 2009.

/Roberto Ledesma/

Roberto Ledesma